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Attorneys for Irving H. Picard, Esq., as Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

(Substantively Consolidated)

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

SAGE ASSOCIATES;

LILLIAN M. SAGE, IN HER CAPACITY AS PARTNER OR JOINT VENTURER OF SAGE ASSOCIATES AND INDIVIDUALLY AS BENEFICIARY OF SAGE

Adv. Pro. No. 10-04362 (SMB)

ASSOCIATES;

MALCOLM H. SAGE, IN HIS CAPACITY AS PARTNER OR JOINT VENTURER OF SAGE ASSOCIATES, INDIVIDUALLY AS BENEFICIARY OF SAGE ASSOCIATES, AND AS THE PERSONAL REPRESENTATIVE OF THE ESTATE OF LILLIAN M. SAGE;

MARTIN A. SAGE, IN HIS CAPACITY AS PARTNER OR JOINT VENTURER OF SAGE ASSOCIATES AND INDIVIDUALLY AS BENEFICIARY OF SAGE ASSOCIATES; AND

ANN M. SAGE PASSER, IN HER CAPACITY AS PARTNER OR JOINT VENTURER OF SAGE ASSOCIATES AND INDIVIDUALLY AS BENEFICIARY OF SAGE ASSOCIATES,

Defendants.

SECOND AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the October 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures shall be due: December 21, 2015.
- 2. Fact Discovery shall be completed by: September 29, 2017.
- 3. The Disclosure of Case-in-Chief Experts shall be due: January 5, 2018.
- 4. The Disclosure of Rebuttal Experts shall be due: March 16, 2018.
- 5. The Deadline for Completion of Expert Discovery shall be: April 27, 2018.
- 6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before May 11, 2018.
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before May 25, 2018.

8. The Deadline for Conclusion of Mediation shall be: On or before September 14, 2018.

Dated: June 21, 2017

New York, New York

By: /s/ Heather J. McDonald

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Bernard L. Madoff

/s/ Andrew B. Kratenstein

Consented To:

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